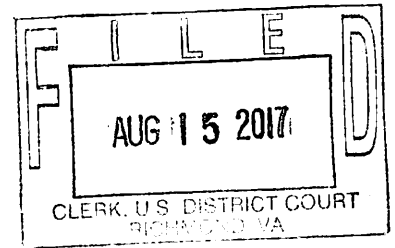


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA

v.

CHARLES TIFFIT ELLIS, JR.

Defendant.

)
)
) Criminal No. 3:17-CR- 108
)

) Count One: 18 U.S.C. § 2251(d)(1)(A)
) (Advertising Child
) Pornography)
)

) Count Two: 18 U.S.C. § 2252A(a)(2)
) (Receipt of Child
) Pornography)
)

) 18 U.S.C. § 2253
) (Forfeiture Notice)
)

August 2017 Term – at Richmond, Virginia

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Advertising Child Pornography)

On or about June 26, 2017, in the Eastern District of Virginia and elsewhere within the jurisdiction of the Court, the defendant, CHARLES TIFFIT ELLIS, JR., knowingly published and caused to be published a notice and advertisement offering to distribute a visual depiction the production of which involved the use of a minor engaging in sexually explicit conduct, and which depiction was of such conduct, and the defendant knew and had reason to know that such notice and advertisement would be transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mailed, and such notice and advertisement was transported using any means or facility of

interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mailed.

(In violation of Title 18, United States Code, Section 2251(d)(1)(A).)

COUNT TWO
(Receipt of Child Pornography)

On or about July 18, 2017, in the Eastern District of Virginia, the defendant, CHARLES TIFFIT ELLIS, JR., knowingly received child pornography, as defined by 18 U.S.C. § 2256, to wit: one video file entitled “30864d64-b21-400e-9303-70e7cf4852fb.mp4,” which depicts an actual child engaged in sexually explicit conduct, specifically a prepubescent female engaged in oral-genital sexual intercourse; that had been mailed, and, using any means or facility of interstate or foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2)(A))

FORFEITURE NOTICE

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that, if convicted of either Counts One or Two, the defendant shall forfeit to the United States his interest in any visual depiction produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Sections 2251 *et seq.*, and any property, real or personal, constituting or traceable to gross profits or other proceeds or used or intended to be used to commit or promote the commission of such offense(s), including, but not limited to the following:

One (1) Samsung SM-G900T Galaxy 5, Serial Number RV8F619KLBZP.

(In accordance with Title 18, United States Code, Section 2253)

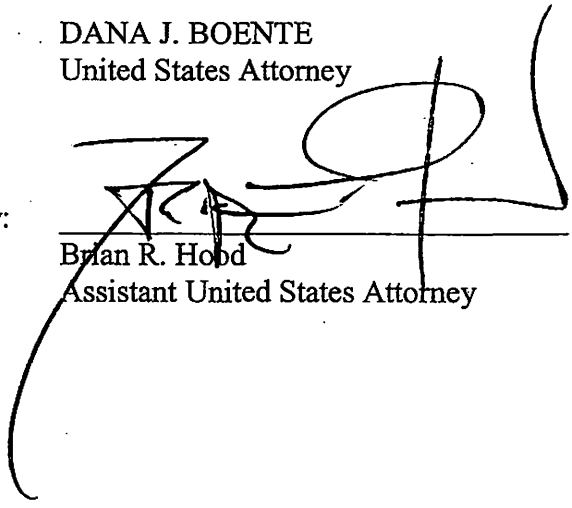
A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

DANA J. BOENTE
United States Attorney

By:



Brian R. Hobd
Assistant United States Attorney